

## **EXHIBIT 75**

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re: §  
§ Chapter 11  
HIGHLAND CAPITAL MANAGEMENT, §  
L.P., § Case No. 19-34054-sgj11  
§  
Debtor. §

**RESPONSE OF GET GOOD TRUST  
TO ORDER REQUIRING DISCLOSURES**

COMES NOW Get Good Trust and files this response of Get Good Trust to *Order Requiring Disclosures* [Dkt. # 2460] (the “Order”), entered by the Court *sua sponte* in the above styled and numbered Chapter 11 bankruptcy case (the “Bankruptcy Case”) of Highland Capital Management, L.P. (the “Debtor”), respectfully stating as follows:

**I. RESPONSE**

1. The Court has entered an order requiring Get Good Trust to make certain disclosures relative to its standing in connection with the above captioned matter. The Court has already ruled on a number of matters before this Court that Get Good Trust has possessed the requisite standing on matters that it has taken a position or filed a support pleading.



2. The Get Good Trust is actually three different trust, the Get Good Trust, The Get Good Non Exempt Trust No. 1, and the Get Good Non Exempt Trust No. 2 (together, the “Trusts”). The Trusts are all named as “Related Entities” which are enjoined by Debtor’s *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (As Modified)* (the “Plan”). See Dkt. No. 1811-9 at p. 19. As enjoined parties, the Trusts have standing to seek relief from the Plan. See, e.g., *Samnorwood Indep. Sch. Dist. v. Tex. Educ. Agency*, 533 F.3d 258, 265 (5th Cir. 2008) (“a third party had standing to appeal an injunction which adversely affects its interest, even when it was not a party to the litigation”).

3. The numerous adversary proceedings in which Get Good Trust has been named a party give it standing to participate not just in the adversary proceedings, but in the bankruptcy case itself.

4. Further, Trusts have standing based upon the proofs of claim that they have filed in this bankruptcy case. Although the Debtor has challenged the Trusts’ claims, they have the right to assert the claims and participate in these bankruptcy proceedings as parties in interest.

## II. DISCLOSURES

5. Get Good Trust is a **Delaware** Trust. As a Trust, it has no owners, rather, beneficiaries and a trustee. Distributions out of the Trust and the decisions made on behalf of the Trust are governed by the Trust documents. The inception of the Trust was in 2001 and Jim Dondero is the settlor of the Trust and Grant Scott is the Trustee. Grant Scott is the current Trustee. The Trust has two parts within the Trust which are designated as Part A and Part B. One part is designated as exempt and the other non exempt. Both Part A and Part B were created under the 2001 Trust Document executed by Scott as Trustee and Dondero as Settlor.

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6. Ultimate beneficiaries of the Get Good Trust are the Children and Descendants of Jim Dondero.

7. A search of the KCC site for proofs of claim in this case reveals that Get Good and Get Good Non Exempt Trusts 1 and 2 have filed proofs of claim. The claims are numbered 120 (the Get Good Trust), 128 (Get Good Non Exempt Trust 1) and 129 (Get Good Non Exempt Trust 2). The claims are based upon and audit of the Debtor's 2008 tax return, which audit may result in the Debtor being liable to its limited partners, including the three Get Good Trusts. The Claims also relate to the Debtor's failure to make tax distributions for the period 2004 through 2018.

July 9, 2021.

Respectfully submitted,

*/s/Douglas S. Draper.*

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#### **CERTIFICATE OF SERVICE**

I, Douglas S. Draper, counsel for Get Good Trust, do hereby certify that I caused a copy of the above and foregoing to be served on **July 9, 2021**, via the Court's ECF Notification

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